

*** On the issue of multiple vanity callsign applications (paragraphs 52-54):

The abuse of the ability of a single applicant to file multiple vanity applications on the same day, is reaching epidemic proportions. In all of year 2003, there were 28 applicants who filed ten or more vanity applications on the same day; in March 2004, there were eight, and in April 2004 there were ten (see <http://amateur.mailpen.net/ShowGenAppMulti.phtml?COUNT=10&SORT=Date>). Aside from the perception of unfairness in the application process, these multiple filings cost the FCC money (both internal and out-of-pocket), because invariably these multiple filers request a refund of all of their applications that were dismissed: Not only does the FCC not get to keep the \$16.30 per application, but if an applicant pays via credit card, there are the authorization and discount fees that the credit card merchant service charges. For \$16.30, a typical merchant will pay \$0.25 plus 2.3% (\$0.63 on \$16.30). Even if the FCC gets a very favorable rate, I'll bet you are paying at least \$0.50 per \$16.30. Then there is the internal cost to the FCC of processing the refund request, and I'll bet that is a labor-intensive process (especially compared to filing).

So, when an amateur applicant files 50 applications for the same callsign (50 is not uncommon, and the record is over 150), he then files at least a request for refund of at least 49 of them, for a out-of-pocket loss to the FCC of about \$25, plus the internal cost of processing the refunds (I understand that a separate refund check is issued for each application).

Now the FCC every year or so reviews the costs of administering the vanity program, and if the above refund costs are included in that review, guess who gets to absorb those refund costs in the future: other vanity filers who do not abuse the process. This further increases the perception of abuse and unfairness.

I think that the most effective way of dealing with the problem is to allow only one application per day per applicant (or trustee, in the case of club applications). However, the specific rule as proposed by the FCC is fundamentally flawed: It allows the objective of "one application per day per applicant" to be circumvented, by allowing the applicant to file multiple applications, each naming a unique (and unavailable) callsign as the first choice, and a desired (common) callsign as the second choice. While other commentators have suggested specific mechanisms to achieve the objective, I suggest instead a general rule that gives the FCC flexibility to achieve the objective: "Only one application per applicant per day will be considered."

*** On the issue of field-repairable equipment (paragraphs 58-60):

I strongly agree with the FCC's denial of this petition. This petition would not only increase the size, weight, and cost of commercially available amateur equipment, but would also stifle innovation that comes from minaturization (eg, the possible inclusion of GPS receivers in hand-held amateur transceivers). Amateur radio used to lead the communications field in innovation. While that is generally no longer true, at least vendors to the amateur community should be able to use and build on commercially available technology, and I cannot think of a petition that would be more likely to stifle such practices. One can only hope that this petition was submitted as a joke (like the one for color-coded licenses).

*** On the issue of changes to the VE examination procedures (paragraphs 91-93):

I oppose these changes. There already is occasional abuse of the VEC system, and a lack of a required notice will just increase the problem. Also, while a ten-day limit for forwarding data from a VEC to the FCC may be unnecessary today, who is to say what would happen if a VEC suffers leadership or other problems? Why change this rule?

Finally, a suggested VEC rule administrative change: FCC part 97.509(c) rule says: "Each administering VE must be present and observing the examinee throughout the entire examination. ...". This means that if you have 100 VEs giving examinations to two applicants, once one of the applicants finishes an examination, none of VEs may leave the examination room to grade the completed examination until the other applicant finishes the examination. This is absurd, and probably not what you intended. FCC rule 97.509(a) says: "Each examination for an amateur operator license must be administered by a team of at least 3 VEs at an examination session coordinated by a VEC." It seems to me that the intent of 97.509 is that at least three VEs be continuously observing the examinees, and the rule should so state, in my opinion. This frees additional VEs to grade tests and perform other VE-administrative matters during the examination.